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DIVORCE—ALIMONY—JUDGMENT IN PERSONAM—NON-RESIDENT DEFENDANT.—HOOD v. HOOD, 61 S. E., 471 (GA.).—*Held*, that a judgment in *personam* for temporary alimony and attorney's fees cannot be lawfully rendered in a divorce suit brought against a non-resident husband, who is not served with process within this state and does not appear in the case, but is only constructively served by publication.

A decree for temporary alimony is a judgment in *personam*. *Rigney v. Rigney*, 127 N. Y. 408. As a general proposition, service of process by publication in actions in *personam* is insufficient, as it creates no personal liability in the person so served. *Cook v. Cook*, 56 Wis. 1. The legislature may authorize constructive service by the court within its jurisdiction, but has no authority to authorize such notice upon non-residents. *Darcy v. Ketchum et al.*, 11 Howe 165. And a decree rendered against a non-resident under constructive notice may be held void in a foreign state as not constituting "due process of law" under the Fourteenth Amendment. *Eliot v. McCormick*, 144 Mass. 10.

FRAUDS, STATUTES OF—SALES OF PERSONALITY—CORPORATE STOCK.—SPRAGUE v. HOSIE, 118 N. W. 497 (MICH.).—*Held*, that shares of corporate stock which have been issued, are "goods" within the Statute of Frauds.

Although shares of stock are personal property, it has been held that they are not goods within the Statute of Frauds. 1 *Thomp. Corp.*, Sect. 1068. In England, the weight of authority is that they are not goods. *Humble v. Michell*, 11 A. & E. 205; *Heseltine v. Siggers*, 1 Exch. 856; *Watson v. Spratley*, 10 Exch. 222. And Georgia follows this authority. *Rogers v. Burr*, 105 Ga. 432. But the United States courts as a whole, favor the other view. *North v. Forest*, 15 Conn. 400; *Gooch v. Holmes*, 41 Me. 523; *Baltzen v. Nicolay*, 53 N. Y. 467; *Fine v. Hornsky*, 2 Mo. App. 61; *Ely v. Ormsby*, 14 Barb. 570.

HUSBAND AND WIFE—ALIENATION OF AFFECTIONS—RIGHT OF ACTION BY WIFE.—WORKMAN v. WORKMAN, 85 S. E. 997 (IND.).—*Held*, that a wife may maintain an action for damages for the malicious alienation of her husband's affections.

The modern tendency is to hold that the loss of her husband's *consortium*, gives to the wife a right of action within the meaning of the statutes enabling her to sue alone for an injury to her person, property or personal rights. *Nolan v. Pearson*, 191 Mass. 283; *Wolf v. Frank*, 92 Md. 138. Some decisions hold that also she possesses this right at common law, even to the extent of suing alone. *Foot v. Card*, 58 Conn. 1. But in other cases where the right at common law was claimed, the necessity of joining the husband in the action was acknowledged as a disability, which the statutes have now removed. *Bennett v. Bennett*, 116 N. Y. 584. Some courts deny altogether the existence of this right of action, either at common law or under such statutes. *Duffies v. Duffies*, 76 Wis. 374; *Morgan v. Martin*, 92 Me. 190; *Hodge v. Wetzler*, 69 N. J. L. 490.

INSURANCE—ACCIDENT INSURANCE—ACCIDENTAL MEANS.—SCHMIDT v. INDIANA TRAVELERS' ACC. ASS'N., 85 N. E. 1032.—Where one who carried accident insurance died of circulatory failure and paralysis of the heart